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**Hearing Date: March 27, 2019**  
**Objection Deadline: March 20,**  
**2019**

**UNITED STATES BANKRUPTCY COURT**  
**SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L. Madoff  
Investment Securities LLC and the Estate of Bernard  
L. Madoff,

Plaintiff,

v.

FAIRFIELD INVESTMENT FUND LIMITED, *et al.*,

Defendants.

Adv. Pro. No. 09-01239 (SMB)

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L. Madoff  
Investment Securities LLC and the Estate of Bernard  
L. Madoff,

Plaintiff,

v.

BARRENECHE, INC., *et al.*,

Defendants.

Adv. Pro. No. 12-01702 (SMB)

**NOTICE OF MOTION FOR ENTRY OF ORDERS APPROVING AGREEMENTS**  
**BY AND BETWEEN THE TRUSTEE AND SETTLING DEFENDANTS**

**PLEASE TAKE NOTICE** that Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. § 78aaa-III, and the substantively consolidated estate of Bernard L. Madoff, by and through his undersigned counsel, will move before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, at the United States Bankruptcy Court, the Alexander Hamilton Customs House, One Bowling Green, New York, New York 10004, on March 27, 2019 at 10:00 a.m., or as soon thereafter as counsel may be heard, seeking entry of orders, pursuant to section 105(a) of the United States Bankruptcy Code and Rules 2002(a)(3) and 9019(a) of the Federal Rules of Bankruptcy Procedure, approving settlement agreements between the Trustee and:

(1) Lourdes Barreneche; (2) Barreneche Inc.; (3) Robert Blum; (4) Cornelis Boele; (5) Fortuna Asset Management; (6) Gregory Bowes; (7) Harold Greisman; (8) Jacqueline Harary; (9) Richard Landsberger; (10) Daniel Lipton; (11) Mark McKeefry; (12) Gordon McKenzie; (13) Santiago Reyes; (14) Selecta Financial Corporation Inc.; and (15) Andrew Smith, as set forth in the Motion annexed hereto (the “Motion”).

**PLEASE TAKE FURTHER NOTICE** that any responses or objections to the Motion must be in writing, conform to applicable rules of this Court and be filed with the Clerk of the United States Bankruptcy Court, One Bowling Green, New York, New York 10004 in accordance with General Order 242 by no later than **5:00 p.m. on March 20, 2019** (“Objection Deadline”) (with a courtesy copy delivered to the Chambers of the Honorable Stuart M. Bernstein) and must be served upon: (a) Baker & Hostetler LLP, 45 Rockefeller Plaza, New York, New York 10111, Attn: Oren J. Warshavsky; (b) Simpson, Thacher & Bartlett LLP, 425 Lexington Avenue, New York, New York 10017, Attn: Peter E. Kazanoff;

(c) Covington & Burling LLP, One City Center, 850 Tenth Street NW, Washington, DC 20001, Attn: Bruce A. Baird; and (d) Morvillo Abramowitz Grand Iason & Anello P.C., 565 Fifth Avenue, New York, New York 10017, Attn: Edward M. Spiro, so as to be received no later than the Objection Deadline. Any objections to the Motion must specifically state the interest that the objecting party has in these proceedings and the basis of any such objection.

Dated: February 21, 2019  
New York, New York

Respectfully submitted,

/s/ Oren J. Warshavsky

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Trustee for the Substantively Consolidated  
SIPA Liquidation of Bernard L. Madoff  
Investment Securities LLC and the Estate of  
Bernard L. Madoff*